

ICC Docket No. 07-0540

**Commonwealth Edison Company's Response to
CES's (CES) Data Requests 1.1-1.5
Dated: December 21, 2007**

REQUEST NO. CES 1.1:

Please confirm that ComEd is proposing a demand response program that is available only to residential customers.

RESPONSE:

Person responsible for response

James Eber, Commonwealth Edison Company

As described in ComEd's Energy Efficiency and Demand Response Plan ("Plan") (ComEd Ex. 1.0, pp. 73-75) and the direct testimony of James Eber (ComEd Ex. 3.0), ComEd is proposing the expansion of its existing demand response program, Nature First, which is available only to residential customers.

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CNE X
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CNE Group
Cross Ex. 1

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REQUEST NO. CES 1.2:

Please explain in detail the proposed cost allocation and the methodology by which ComEd will recover its costs associated with the demand response program, as to both program costs and associated administrative costs for each customer class. Please provide all documents relied upon in responding to this request.

RESPONSE:

Person responsible for response

Paul R. Crumrine, Commonwealth Edison Company

ComEd has proposed that all Incremental Costs, as that term is defined in proposed Rider EDA, be recovered through a single cents per kilowatt-hour charge (the "Energy Efficiency and Demand Response Adjustment" or "EDA") that is applicable to all customers (*i.e.*, all customer classes); will appear as a separate line item on all customers' bills; and is determined through the formula set forth in the EDA Computation and Application section of Rider EDA. (*See* ComEd Ex. 5.0, 6:126-8:169; ComEd Ex. 1.0, Appendix F). Thus, all Incremental Costs are allocated based on energy usage.

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REQUEST NO. CES 1.5:

With regard to the Stakeholder Advisory Process advocated in the direct testimony of Henry Henderson on behalf of the Natural Resources Defense Council:

- a. Does ComEd agree that Alternative Retail Electric Suppliers may have an interest in such a matter, and be in a position to provide valuable input?
- b. Does ComEd have any objection to an ARES representative being included in any such process?

RESPONSE:

Person responsible for response

Michael Brandt, Commonwealth Edison Company

ComEd objects to this request as overbroad, vague and ambiguous. ComEd further objects to this request on the basis that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, and calls for speculation. Without waiving these objections, ComEd states that it cannot speak for Alternative Retail Electric Suppliers and whether they "may have an interest" in "the Stakeholder Advisory Process advocated in the direct testimony of Henry Henderson on behalf of the Natural Resources Defense Council." However, as stated in ComEd's Energy Efficiency and Demand Response Plan ("Plan") (ComEd Ex. 1.0, p. 27) and the direct testimony of Michael Brandt (ComEd Ex. 2.0, pp. 36-37), ComEd is "committed to continued engagement with . . . stakeholders," "propose[s] . . . the establishment of a collaborative process facilitated by an independent, third party organization or individual accepted by all parties," and anticipates that "[p]articipants in this collaborative process would include . . . representation from a variety of interests."